

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REBECCA COUSINEAU, individually on her
own behalf and on behalf of all others similarly
situated,

Plaintiff,

v.

MICROSOFT CORPORATION, a Delaware
corporation,

Defendant.

No. 11-cv-01438-JCC

**STIPULATION AND [PROPOSED]
CASE MANAGEMENT
SCHEDULING ORDER**

Noted for Consideration:
February 14, 2012

STIPULATION

As the Court requested at a status conference held on February 7, 2012, the parties
stipulate to the following case schedule:

1. Plaintiff's Motion for Class Certification: August 13, 2012
2. Microsoft's Opposition to Class Certification:
 - a. If Plaintiffs do not support Motion with expert: September 12, 2012
 - b. If Plaintiffs support Motion with expert report: October 12, 2012
3. Plaintiff's Reply on Class Certification:
 - a. If Microsoft does not support Opp. with expert: October 2, 2012
 - b. If Microsoft supports Opp. with expert report: November 26, 2012
4. Mediation (LR 39.1)–within 45 days of decision on class motion: TBD
5. Non-expert Discovery Closes: March 29, 2013

- | | |
|---|--------------------|
| 6. Plaintiff's Expert Reports Disclosed (FRCP 26(a)(2)) | April 15, 2013 |
| 7. Defendant's Expert Reports Disclosed (FRCP 26(a)(2)) | June 14, 2013 |
| 8. Plaintiff's Rebuttal Expert Reports Disclosed (FRCP 26(a)(2)) | June 28, 2013 |
| 9. Expert Discovery Closes (120 days before trial): | July 5, 2013 |
| 10. Dispositive Motion Cutoff (90 days before trial): | August 5, 2013 |
| 11. Pltf. Pretrial Statement (30 days before Prop. Pretrial Order): | September 6, 2013 |
| 12. Def. Pretrial Statement (20 days before Prop. Pretrial Order): | September 16, 2013 |
| 13. Proposed Pretrial Order (30 days before trial): | October 7, 2013 |
| 14. Trial (5-10 days): | November 4, 2013 |

STIPULATED AND AGREED this 14th day of February, 2011.

EDELSON MCGUIRE LLC

By /s/ Rafey S. Balabanian

Jay Edelson*

Rafey S. Balabanian*

Ari J. Scharg*

EDELSON MCGUIRE, LLC

350 North LaSalle Street, Suite 1300

Chicago, Illinois 60654

Telephone: (312) 589-6370

Facsimile: (312) 589-6378

jedelson@edelson.com

rbalabanian@edelson.com

ascharg@edelson.com

*Admitted *pro hac vice*

Kim D. Stephens, WSBA #11984

Janissa A. Strabuk, WSBA #21827

Tousley Brain Stephens PLLC

1700 Seventh Avenue, Suite 2200

Seattle, Washington 98101

Telephone: (206) 682-5600

Facsimile: (206) 682-2992

kstephens@tousley.com

Counsel for Rebecca Cousineau and the Putative Class

DAVIS WRIGHT TREMAINE LLP
Attorneys for Defendant Microsoft Corporation

By /s/ Stephen M. Rummage

Stephen M. Rummage, WSBA #11168
Fred B. Burnside, WSBA #32491
Randal L. Gainer, WSBA #11823
Zana Bugaighis, WSBA #43614
1201 Third Avenue, Suite 2200
Seattle, Washington 98101-3045
Telephone: (206) 622-3150, Fax: (206) 757-7700
E-mail: steverummage@dwt.com
E-mail: fredburnside@dwt.com
E-mail: randygainer@dwt.com
E-mail: zanabugaighis@dwt.com

ORDER

IT IS SO ORDERED.

The parties shall adhere to the schedule set forth in the foregoing stipulation.

Dated: February __, 2012.

John C. Coughenour
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2012, the foregoing Stipulation and Proposed Order Regarding Pretrial Deadlines was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who receive CM/ECF notification, and that the remaining parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this ____ day of February, 2012.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Def. Microsoft Corporation

By s/ Stephen M. Rummage
Stephen M. Rummage, WSBA #11168
1201 Third Avenue, Suite 2200
Seattle, Washington 98101-3045
Telephone: (206) 757-8136
Fax: (206) 757-7700
E-mail: steverummage@dwt.com